

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Bky. Case No. 24-30167

Chapter 7

Pro-Mark Services, Inc.,

Debtor.

CAPITAL CREDIT UNION,

Adv. No. 25-07001

Plaintiff,

**NOTICE AND MOTION
FOR APPROVAL OF SETTLEMENT
AGREEMENT**

v.

PRO-MARK SERVICES, INC.

ERIK AHLGREN,

as Trustee for Debtor's Estate;

UNITED STATES AIR FORCE; and

HARTFORD ACCIDENT AND

INDEMNITY COMPANY,

Defendants.

Erik Ahlgren, the bankruptcy Trustee in this case, respectfully requests that the Court approve a Settlement Agreement entered into with Capital Credit Union ("CCU"), the United States Air Force (the "United States") and the Hartford Accident and Indemnity Company ("Hartford"). The Settlement Agreement, in essential part, provides as follows:

Pro-Mark Services, Inc. (the "Debtor") filed for bankruptcy protection on April 24, 2024, in the District of North Dakota, Case No. 24-30167. The United States and the Debtor entered into and are parties to contracts, which are not bonded, have been fully or partially completed, and are awaiting payments for which the United States continues to hold. The total amount owing on the contracts is \$146,831.25 (the "Contract Payment"). There are presently disputes regarding the proper party to receive the amounts owing. The parties agree that the United States shall remit the Contract Payment to the Trustee to hold in his trust account until there is an agreement among the parties or a final judicial determination regarding the proper party to receive the funds. Trustee waives and shall not assert any claims against the United States pursuant to the contracts beyond the right to receive the Contract Payment. CCU and Hartford waive and shall not assert any claims against the United States relating to the contracts set forth in Settlement Agreement. CCU and Hartford retain any claims they may have against each other, the Trustee, or other third parties, with respect to the Contract Payment. The United States shall make the Contract Payment to the Trustee within 90 days following the entry of a final Order by the Court approving the settlement. A copy of the Settlement Agreement may be obtained by contacting the bankruptcy Trustee.

NOTICE OF MOTION: Your rights may be affected in this action. You should read these papers carefully and discuss the matters with your attorney if you have one. Any objections to this motion must be made within 21 days of this date with an original filed with the Clerk of Bankruptcy Court and copies served upon the Bankruptcy Trustee and United States Trustee at the addresses stated below. Failure to timely respond to this motion will be deemed a waiver of any objections and the Court will grant such relief as it deems appropriate.

Clerk, U.S. Bankruptcy Court
Quentin N. Burdick U.S. Courthouse
655 First Ave. N. – Suite 210
Fargo, ND 58107-4932

United States Trustee
314 South Main Ave.
Suite 303
Sioux Falls, SD 57104-6462

Trustee
(see address below)

DATE OF MAILING: August 14, 2025

/s/ Erik Ahlgren

Erik Ahlgren, Trustee
Ahlgren Law Office, PLLC
220 W Washington Ave. Ste 105
Fergus Falls, MN 56537